

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

MAIL PROCESSING NETWORK
RATIONALIZATION SERVICE CHANGES, 2012

DOCKET No. N2012-1

**INSTITUTIONAL RESPONSES OF THE UNITED STATES POSTAL SERVICE TO
INTERROGATORIES OF THE AMERICAN POSTAL WORKERS UNION, AFL-CIO,
REDIRECTED FROM POSTAL SERVICE WITNESS RACHEL (APWU/USPS-T8-3-4)**

The United States Postal Service hereby provides institutional responses to the above-referenced interrogatories of the American Postal Workers Union (APWU), AFL-CIO, dated February 24, 2012, redirected from Witness Rachel (USPS-T-8). Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

By its attorneys:

KEVIN A. CALAMONERI
Managing Counsel
Corporate and Postal Business Law

MATTHEW J. CONNOLLY
Attorney

475 L'Enfant Plaza, S.W.
Washington, D.C. 20260-1137
(202) 268-2998; Fax -5402
March 9, 2012

**INSTITUTIONAL RESPONSES OF UNITED STATES POSTAL SERVICE
TO AMERICAN POSTAL WORKERS UNION, AFL-CIO INTERROGATORIES,
REDIRECTED FROM WITNESS RACHEL**

APWU/USPS-T8-3. Please confirm that in the implemented Daytona to Mid-FL AMP approved February 4, 2011

- a) 29 maintenance employees were reassigned;
- b) 20 of those employees were given saved grade because their new assignments were at a lower level.
- c) The original AMP made no estimate of such costs.
- d) The PIRs did not consider those ongoing costs.

If you do not confirm, please provide the correct numbers with any necessary explanation.

RESPONSE:

- (a) Not confirmed. Thirty (30) maintenance employees were reassigned.
- (b) Not confirmed. Nineteen (19) of these employees were afforded a saved grade due to their placement in lower-level assignments.
- (c) The Postal Service interprets this interrogatory part as asking whether the original Daytona to Mid-FL AMP accounts for costs due to the reassignment of employees referred to in the response to part (a) and due to the fact that certain employees were given a saved grade, as noted in the response to part (b). The Postal Service does not confirm the statement in part (c) of this interrogatory.

The AMP study accounts for the movement of training hours to the gaining facility. In this instance, approximately 424 training hours were allocated to Mid-Florida operation number 783 (Training – Plant & Equipment) equating to approximately \$16K in cost.
- (d) The Postal Service interprets this interrogatory part as asking whether any Post-Implementation Reviews (PIRs) concerning the Daytona to Mid-FL AMP account for costs due to the reassignment of employees referred to in the response to

**INSTITUTIONAL RESPONSES OF UNITED STATES POSTAL SERVICE
TO AMERICAN POSTAL WORKERS UNION, AFL-CIO INTERROGATORIES,
REDIRECTED FROM WITNESS RACHEL**

RESPONSE APWU/USPS-T8-3 (CONT.):

part (a) and due to the fact that certain employees were given a saved grade, as noted in the response to part (b). The Postal Service does not confirm the statement in part (d) of this interrogatory. No PIRs concerning the Daytona to Mid-FL AMP have been finalized. Additionally, such costs are typically included in a PIR analysis.

**INSTITUTIONAL RESPONSES OF UNITED STATES POSTAL SERVICE
TO AMERICAN POSTAL WORKERS UNION, AFL-CIO INTERROGATORIES,
REDIRECTED FROM WITNESS RACHEL**

APWU/USPS-T8-4. Please confirm that in the implemented Daytona to Mid-FL AMP approved February 4, 2011, 25 reassigned clerks received paid training:

- a) 8 received window training,
- b) 8 received both window and scheme training,
- c) 5 received training on keying on parcel machine,
- d) 2 received scheme training,
- e) 2 received BMEU training in residence at Norman OK,
- f) The original AMP made no estimate of such costs.
- g) The PIRs did not consider these costs.

If you do not confirm, please provide the correct numbers with any necessary explanation.

RESPONSE:

Not confirmed. Seventeen (17) reassigned clerks received paid training.

- (a) Confirmed.
- (b) Not confirmed. Seven (7) people received both window and scheme training.
- (c) Not confirmed. Parcel machines used at this location do not require keying.
- (d) Not confirmed. No persons received training solely on scheme.
- (e) Confirmed.
- (f) The Postal Service interprets this interrogatory part as asking whether the original Daytona to Mid-FL AMP accounts for the training costs discussed in the responses to parts (a) through (e) of this interrogatory. The Postal Service does not confirm the statement in part (c) of this interrogatory. Please be advised that the AMP study accounts for the movement of training hours to the gaining facility. In this instance, approximately 1,500 hours were allocated to Mid-Florida operation number 781 (Training – Mail Processing) equating to approximately \$54K in cost.

**INSTITUTIONAL RESPONSES OF UNITED STATES POSTAL SERVICE
TO AMERICAN POSTAL WORKERS UNION, AFL-CIO INTERROGATORIES,
REDIRECTED FROM WITNESS RACHEL**

RESPONSE APWU/USPS-T8-4 (CONT.):

- (g) The Postal Service interprets this interrogatory part as asking whether any Post-Implementation Reviews (PIRs) concerning the Daytona to Mid-FL AMP account for the training costs discussed in the responses to parts (a) through (e) of this interrogatory. The Postal Service does not confirm the statement in part (g) of this interrogatory. No PIRs concerning the Daytona to Mid-FL AMP have been finalized. Additionally, such costs are typically included in a PIR analysis.